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MEMORANDUM

From: Wilkinson Barker Knauer LLP

Re: WBK Advisory - 2016 Calendar of Important Dates for Broadcasters

Now that the new year has begun, broadcasters should be taking stock of their regulatory obligations for 2016. Each year, every broadcaster has many routine regulatory deadlines that it must meet. A broadcaster's regulatory obligations include its Equal Employment Opportunities ("EEO") public file report, quarterly issues/programs lists, and annual FCC regulatory fees, all of which are required every year. Television stations have the extra burden of complying with requirements of the children's television rules and the annual FCC Form 317 [now known as FCC Form 2100 Schedule G].

But each year also brings its own regulatory obligations, and 2016 is no different. This new year will be filled with political broadcasting obligations including lowest unit rate windows before the many primaries and caucuses, as well as the window before the November general election. For TV broadcasters, there will also be many obligations imposed by the incentive auction, which is scheduled to take place in 2016. In this auction, the FCC will offer many TV broadcasters significant sums of money to surrender their TV channels, and, after stations decide whether or not to surrender their channels, the spectrum dedicated to TV will shrink and the remaining TV stations will be repacked into what is left of the TV band.

For radio broadcasters who stream their programming on the Internet, there are required filing dates for monthly statements of account and reports of use. While the deadlines were just recently been decided by the Copyright Royalty Board, and may be subject to appeal, all companies that are webcasting should try to comply with the deadlines while these appeals are pending. Stations also have obligations to pay ASCAP, BMI, and SESAC. Review your agreements with these organizations to make sure that you meet all required deadlines.

To help keep track of these and other obligations, we have put together this advisory to provide a preview of, and some guidance for, many of the important FCC compliance-related dates, as well as other deadlines broadly applicable to significant portions of the broadcast industry. The attached calendar is not intended to cover all filing dates that apply to every station or licensee. Instead, the calendar is meant to highlight some of the more critical deadlines that we are able to identify in advance. Remember, these dates can change, and new deadlines for action can be added, so be sure to keep up with the latest developments by talking to your attorney or other advisors.

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It is also important to check with your accountant, tax advisor, and local counsel on dates for filings such as those relating to local business and real estate fees and taxes, filing dates for Equal Employment Opportunity Commission submissions for large employers, and other requirements that may be applicable to your station(s).

In our calendar, we provide a description of the obligation, the due date and the place where compliance is required (*e.g.*, through an FCC filing, an addition to the public file, etc.). Note that TV broadcasters have an online public file obligation, and they must ensure that the required documentation (such as the annual EEO public inspection file report or quarterly issues/programs lists) is uploaded by the applicable deadline to the station's online public file hosted by the FCC. The FCC may extend online public file obligations to radio stations in 2016, so radio stations should monitor that issue carefully.

Also included in the calendar are other one-time events unique to 2016. Obviously, these include dates related to the incentive auction. They also include accessibility compliance obligations for television stations that take effect in 2016. Beginning January 1, television stations that provide Internet clips of programing that was captioned on the air must also caption those clips on the Internet.

Our calendar includes dates for the lowest unit rates for the primaries and caucuses leading up to the November presidential election. Note that there may be different dates for primaries for other Federal elections for House and Senate seats to be contested in 2016, and many other deadlines for various state and local offices that will be filled through elections this coming year. Thus, broadcasters in states with such elections must be mindful of a number of Lowest Unit Rate periods during which stations can charge political candidates (Federal, state, and local) who are running in a general or primary election no more than the Lowest Unit Rate for the same class and amount of time on the station. Lowest Unit Rate periods begin 45 days before each primary election and 60 days before each general election. The 45-day period also applies to primary run-off elections. While the reasonable access provisions of the political rules do not apply to state and local races, if stations decide to sell time to candidates in these elections, they do have to charge Lowest Unit Rates during these political windows.

These dates are based on information we found as of November 25, 2015, and they may change before the actual primaries, caucuses and other elections. *Thus, it is important for stations to confirm these election dates, and the corresponding Lowest Unit Rate periods, for the states they serve.* As you sell political time, be aware of the political windows in which the Lowest Unit Rate will be applicable for candidates participating in those elections.

We also note that, in June, certain television stations will need to begin to file EEO Mid-Term Reports on FCC Form 397 (radio began their filing cycle in 2015). Also, we have noted filing dates for biennial ownership reports for noncommercial stations. However, the FCC has pending a proceeding that may align those filing dates with the biennial ownership reporting

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deadlines for commercial stations (reports just filed in late 2015 and not due again until 2017). Watch for action in this proceeding which could come at any time.

As the year progresses, there will no doubt be other compliance deadlines that arise. We try to provide information about many of these deadlines, and about other regulatory issues that arise during the course of the year, on our blog: http://www.broadcastlawblog.com/. Check our blog regularly, and talk to any of the attorneys in our Broadcast Group, for more information about the many deadlines and other issues that will be important to broadcasters in 2016.

With that background, some important dates for 2016 are set out in the calendar that follows.

2016 BROADCASTERS CALENDAR

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
January 1, 2016	A TV station or video programming provider that posts on its website (or app) "straight" video clips (that is, a single excerpt of a captioned television program with the same video and audio as presented on television) must include closed captioning if the material was presented on television with closed captions on or after January 1, 2016.	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations, LPTV Stations, and any other video programming provider
January 6, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on February 20, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any February 20 th primary election, caucus, or primary runoff election. A Democratic caucus is scheduled in Nevada , as well as a Republican Caucus in Washington and a Republican primary election in South Carolina, on February 20, 2016. 1

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
January 9, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on February 23, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any February 23 rd primary election, caucus, or primary runoff election. A Republican caucus scheduled in Nevada on February 23, 2016. ¹
January 10, 2016	Records showing compliance with commercial limits on Children's Television Programming during Q4-2015 must be placed in stations' public inspection files.	Stations' Public Inspection Files	Commercial Full-Power and Class A Television Stations
	Issues/Programs Lists for Q4-2015 must be placed in stations' public inspection files.	Stations' Public Inspection Files	Commercial and Noncommercial Full Power and Class A Television Stations; Commercial and Noncommercial AM and FM Radio Stations
	Documentation of Class A Television Continuing Eligibility should be placed in stations' public inspection files. ²	Stations' Public Inspection Files	Class A Television Stations
January 11, 2016 ³	Children's Television Programming Reports (FCC Form 398) for Q4-2015 must be filed and placed in stations' public inspection files. ⁴	FCC; Stations' Public Inspection Files	Commercial Full-Power and Class A Television Stations

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
January 12, 2016	FCC Form 177 must be filed prior to 6:00 p.m. ET to indicate television stations' interest in participating in the Incentive Auction, including whether they are interested in fully relinquishing their channels or in moving to a VHF channel, and also requiring the filing of any channel sharing agreement.	FCC (electronically via the Auction System)	All Television Stations interested in participating in the Incentive Auction
January 13, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on February 27, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any February 27 th primary election, caucus, or primary runoff election. A primary election is scheduled in South Carolina on February 27, 2016 ¹ .
January 14, 2016	For songs streamed during the month ending Nov. 30, 2015 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁵

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
January 16, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on March 1, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any March 1 st primary election, caucus, or primary runoff election. Primary elections are scheduled in Alabama, Arkansas, Georgia, Massachusetts, Oklahoma, Tennessee, Texas, Vermont, and Virginia, and caucuses are scheduled in Alaska, American Samoa, Colorado, Minnesota, and Wyoming on March 1, 2016.1
January 20, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on March 5, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any March 5 th primary election or caucus. A primary election is scheduled in Louisiana , and caucuses are scheduled in Kansas , Kentucky , Maine , and Nebraska on March 5, 2016.

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
January 21, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on March 6, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any March 6 th primary election or caucus. A caucus is scheduled in Maine on March 6, 2016.
January 23, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on March 8, 2016.	N/A	Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any March 8 th primary election, caucus, or primary runoff election. Primary elections are scheduled in Idaho , Michigan , and Mississippi , and Presidential caucuses are scheduled in American Samoa and Hawaii on March 8, 2016. ¹

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
January 27, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on March 12, 2016.	N/A	Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any March 12 th primary election, caucus, or primary runoff election. Caucuses are scheduled in Guam and the U.S. Virgin Islands on March 12, 2016. ¹
January 28, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on March 13, 2016.	N/A	Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any March 13 th primary election, caucus, or primary runoff election. A primary election is scheduled in Puerto Rico on March 13, 2016. ¹
January 29, 2016	Beginning of first-come first-served window for AM station licensees to file application to relocate FM translators as much as 250 miles to use in connection with their AM station. Window ends July 28, 2016.	FCC	Class C and D AM station licensees

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
January 30, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on March 15, 2016.	N/A	Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any March 15 th primary election, caucus, or primary runoff election.
			Primary elections are scheduled in Florida , Illinois , Missouri , North Carolina , and Ohio on March 15, 2016.
	Television stations that participate in the Emergency Alert System (EAS) must comply with new FCC visual standards.	N/A	TV stations must meet minimum requirements for visual display legibility, message completeness, and message placement, in order to ensure that EAS visual messages are readable and accessible to all members of the public, including people with disabilities
January 31, 2016	Annual, nonrefundable minimum fee of \$500 for each channel and station.*	SoundExchange	Webcasters ⁵

^{*}This is the date by which most webcasters who are governed by rules adopted by the Copyright Royalty Board must file minimum fees for 2016. Note that certain noncommercial stations affiliated with NPR, CPB and American Public Radio may not need to observe this deadline. Noncommercial webcasters affiliated with colleges and high schools that elect to be covered by a set of rates resulting from a settlement of the CRB proceeding between College Broadcasters, Inc. ("CBI") and SoundExchange must elect such coverage and make minimum payments set out under that agreement by January 31.

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
February 1, 2016	Annual EEO Public File Reports must be placed in stations' public inspection files.	Stations' Public Inspection File	Commercial and Noncommercial Full-Power and Class A Television Stations and AM and FM Radio Stations in Arkansas, Kansas, Louisiana, Mississippi, Nebraska, New Jersey, New York, and Oklahoma that are part of an Employment Unit ⁶ with 5 or more full-time employees
	Biennial Ownership Reports (FCC Form 323-E) must be filed and placed in stations' public inspection files. ⁴	FCC; Stations' Public Inspection Files	Noncommercial Television Stations in Kansas, Nebraska, and Oklahoma; Noncommercial AM and FM Radio Stations in Arkansas, Louisiana, Mississippi, New Jersey, and New York
	Broadcast Mid-Term Report (FCC Form 397).	FCC; Stations' Public Inspection Files	Radio Station Employment Units ⁶ with 11 or more full-time employees in Arkansas , Louisiana , and Mississippi

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
February 6, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on March 22, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any March 22 nd primary election, caucus, or primary runoff election. A primary election is scheduled in Arizona, caucuses are scheduled in Utah and Idaho, and a primary runoff election (if necessary) is scheduled in Arkansas on March 22, 2016. ¹
February 10, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on March 29, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any March 29 th primary election, caucus, or primary runoff election. Caucuses are scheduled in Alaska, Hawaii, and Washington on March 26, 2016. ¹

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
February 13, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on March 29, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any March 29 th primary election, caucus, or primary runoff election. A primary runoff election (if necessary) is scheduled in Mississippi on March 29, 2016. ¹
February 14, 2016	For songs streamed during the month ending Dec. 31, 2015 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁵
February 20, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on April 5, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any April 5 th primary election, caucus, or primary runoff election. A primary election is scheduled in Wisconsin on April 5, 2016.

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
February 24, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on April 9, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any April 9 th primary election, caucus, or primary runoff election. A caucus is scheduled in
			Wyoming on April 9, 2016. ¹
February 27, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on April 12, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any April 12 th primary election, caucus, or primary runoff election. A primary runoff election (if necessary) is scheduled in Alabama on April 12, 2016. ¹

MARCH 2016

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
March 5, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on April 19, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any April 19 th primary election, caucus, or primary runoff election. A primary election is scheduled in New York on April 19, 2016. ¹
March 12, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on April 26, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any April 26 th primary election, caucus, or primary runoff election. Primary elections are scheduled in Connecticut, Delaware, Maryland, Pennsylvania, and Rhode Island on April 26, 2016. ¹

MARCH 2016

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
March 17, 2016	For songs streamed during the month ending Jan. 31, 2016 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁵
March 19, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on May 3, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any May 3 rd primary election, caucus, or primary runoff election. Primary elections are scheduled in Indiana, North Carolina, and Tennessee on May 3, 2016. ¹
March 21, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on May 5, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any May 5 th primary election, caucus, or primary runoff election. A caucus is scheduled in Guam on May 5, 2016.

MARCH 2016

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
March 26, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on May 10, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any May 10 th primary election, caucus, or primary runoff election. Primary elections are scheduled in Nebraska and West Virginia on May 10, 2016.
March 29, 2016	Incentive Auction applicants must commit to an opening price offer on preferred bid option prior to 6:00 p.m. ET.	FCC	All Television Stations participating in the Incentive Auction.

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
April 1, 2016	Broadcast Mid-Term Report (FCC Form 397).	FCC; Stations' Public Inspection Files	Radio Station Employment Units ⁶ with 11 or more full-time employees in Indiana , Kentucky , and Tennessee
	Annual EEO Public File Reports must be placed in stations' public inspection files.	Stations' Public Inspection File	Commercial and Noncommercial Full-Power and Class A Television Stations and AM and FM Radio Stations in Delaware , Indiana , Kentucky , Pennsylvania , Tennessee , and Texas that are part of an Employment Unit ⁶ with 5 or more full-time employees
	Biennial Ownership Reports (FCC Form 323-E) must be filed and placed in stations' public inspection files. ⁴	FCC; Stations' Public Inspection Files	Noncommercial Television Stations in Texas; Noncommercial AM and FM Radio Stations in Delaware, Indiana, Kentucky, Pennsylvania, and Tennessee

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
April 2, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on May 17, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any May 17 th primary election, caucus, or primary runoff election. Primary elections are scheduled in Oregon , Idaho , and Kentucky on May 17, 2016. ¹
April 9, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on May 24, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any May 24 th primary election, caucus, or primary runoff election. A primary election is scheduled in Georgia , and a primary runoff election (if necessary) is scheduled in Texas on May 24, 2016. ¹
April 10, 2016	Records showing compliance with commercial limits on Children's Television Programming during Q1-2016 must be placed in stations' public inspection files.	Stations' Public Inspection Files	Commercial Full-Power and Class A Television Stations

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
	Issues/Programs Lists for Q1-2016 must be placed in stations' public inspection files.	Stations' Public Inspection Files	Commercial and Noncommercial Full Power and Class A Television Stations; Commercial and Noncommercial AM and FM Radio Stations
	Documentation of Class A Television Continuing Eligibility should be placed in stations' public inspection files. ²	Stations' Public Inspection Files	Class A Television Stations
April 11, 2016	Children's Television Programming Reports (FCC Form 398) for Q1-2016 must be filed and placed in stations' public inspection files. ⁴	FCC; Stations' Public Inspection Files	Commercial Full-Power and Class A Television Stations
April 14, 2016	For songs streamed during the month ending Feb. 28, 2016 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁵

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
April 21, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on June 5, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any June 5 th primary election, caucus, or primary runoff election. A caucus is scheduled in the U.S. Virgin Islands on June 5, 2016.
April 23, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on June 7, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any June 7 th primary election, caucus, or primary runoff election. Primary elections are scheduled in California, Iowa, Montana, New Jersey, New Mexico, and South Dakota on June 7, 2016. 1

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
April 30, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on June 14, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any June 14 th primary election, caucus, or primary runoff election. Primary elections are scheduled in Maine, Nevada, North Dakota, South Carolina, Virginia and the District of Columbia on June 14, 2016. ¹

MAY 2016

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
May 7, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on June 21, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any June 21st primary election, caucus, or primary runoff election.
			A primary runoff election (if necessary) is scheduled in North Carolina on June 21, 2016.
May 14, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on June 28, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any June 28 th primary election, caucus, or primary runoff election. Primary elections are scheduled in Colorado, Oklahoma, and Utah, and a primary runoff election (if necessary) is scheduled in South Carolina on June 28, 2016. 1

MAY 2016

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
May 15, 2016	For songs streamed during the month ending Mar. 31, 2016 — (1) Reports of Use containing information about songs streamed; and	SoundExchange	Webcasters ⁵
	(2) Monthly royalty fee		

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
June 1, 2016	Annual EEO Public File Reports must be placed in stations' public inspection files.	Stations' Public Inspection File	Commercial and Noncommercial Full-Power and Class A Television Stations and AM and FM Radio Stations in Arizona, Idaho, Maryland, Michigan, Nevada, New Mexico, Ohio, Utah, Virginia, West Virginia, Wyoming, and the District of Columbia that are part of an Employment Unit ⁶ with 5 or more full-time employees
	Biennial Ownership Reports (FCC Form 323-E) must be filed and placed in stations' public inspection files. ⁴	FCC; Stations' Public Inspection Files	Noncommercial Television Stations in Arizona, Idaho, Maryland, Nevada, New Mexico, Utah, Virginia, West Virginia, Wyoming, and the District of Columbia; Noncommercial AM and FM Radio Stations in Ohio and Michigan
	Broadcast Mid-Term Report (FCC Form 397). ⁴	FCC; Stations' Public Inspection Files	Radio Station Employment Units ⁶ with 11 or more full-time employees in Michigan and Ohio ; Television Employment Units with five or more full-time employees in Maryland , Virginia , West Virginia and the District of Columbia ⁷

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
June 11, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on July 26, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any July 26 th primary election, caucus, or primary runoff election.
			A primary runoff election (if necessary) is scheduled in Georgia on July 26, 2016. ¹
	For songs streamed during the month ending Apr. 30, 2016 —		
June 14, 2016	(1) Reports of Use containing information about songs streamed; and	SoundExchange	Webcasters ⁵
	(2) Monthly royalty fee		
June 18, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on August 2, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any August 2 nd primary election, caucus, or primary runoff election. Primary elections are scheduled in Kansas, Michigan, Missouri, and Washington on August 2, 2016. ¹

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
June 20, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on August 4, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any August 4 th primary election, caucus, or primary runoff election. Primary elections are scheduled in Tennessee on August 4, 2016. ¹
June 22, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on August 6, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any August 6 th primary election, caucus, or primary runoff election. A primary election is scheduled in the U.S. Virgin Islands on August 6, 2016. ¹

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
June 29, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on August 13, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any August 13 th primary election, caucus, or primary runoff election. A primary election is scheduled in Hawaii on August 13, 2016.

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
July 2, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on August 16, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any August 16 th primary election, caucus, or primary runoff election.
			Primary elections are scheduled in Alaska and Wyoming , and a primary runoff election (if necessary) is scheduled in South Dakota on August 16, 2016.
July 9, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on August 23, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any August 23 rd primary election, caucus, or primary runoff election.
			A primary runoff election (if necessary) is scheduled in Oklahoma on August 23, 2016. ¹
July 10, 2016	Records showing compliance with commercial limits on Children's Television Programming during Q2-2016 must be placed in stations' public inspection files.	Stations' Public Inspection Files	Commercial Full-Power and Class A Television Stations

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
	Issues/Programs Lists for Q2-2016 must be placed in stations' public inspection files.	Stations' Public Inspection Files	Commercial and Noncommercial Full Power and Class A Television Stations; Commercial and Noncommercial AM and FM Radio Stations
	Documentation of Class A Television Continuing Eligibility should be placed in stations' public inspection files. ²	Stations' Public Inspection Files	Class A Television Stations
July 11, 2016	Children's Television Programming Reports (FCC Form 398) for Q2-2016 must be filed and placed in stations' public inspection files. ⁴	FCC; Stations' Public Inspection Files	Commercial Full-Power and Class A Television Stations
July 13, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on August 27, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any August 27 th primary election, caucus, or primary runoff election. A primary election is scheduled in Guam on August 27, 2016.

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
July 15, 2016	For songs streamed during the month ending May 31, 2016 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁵
July 16, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on August 30, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any August 30 th primary election, caucus, or primary runoff election. Primary elections are scheduled in Arizona and Florida on August 30, 2016.
July 28, 2016	End of window for Class C and D AM station licensees to file applications to relocate FM translators as much as 250 miles to serve their AM stations.	FCC	Class C and D AM stations
July 29, 2016 ⁸	Requests to receive compensation for retransmissions of over-the-air television signals by cable and satellite systems.	Copyright Royalty Board	Eligible Television Stations ⁹

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
	Beginning of window for AM station licensees to file to relocate FM translators as much as 250 miles to serve their AM stations.	FCC	Class A and B AM stations, and any Class C or D stations which did not file in earlier translator filing window.
July 30, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on September 13, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any September 13 th primary election, caucus, or primary runoff election. Primary elections are scheduled in Delaware , New Hampshire , New York , and Rhode Island on September 13, 2016. ¹

AUGUST 2016

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
August 1, 2016	Annual EEO Public File Reports must be placed in stations' public inspection files.	Stations' Public Inspection File	Commercial and Noncommercial Full-Power and Class A Television Stations and AM and FM Radio Stations in California, Illinois, North Carolina, South Carolina, and Wisconsin that are part of an Employment Unit ⁶ with five or more full-time employees
	Biennial Ownership Reports (FCC Form 323-E) must be filed and placed in stations' public inspection files. ⁴	FCC; Stations' Public Inspection Files	Noncommercial Television Stations in California, North Carolina, and South Carolina; Noncommercial AM and FM Radio Stations in Illinois and Wisconsin
	Broadcast Mid-Term Report (FCC Form 397). ⁴	FCC; Stations' Public Inspection Files	Radio Station Employment Units ⁶ with 11 or more full-time employees in Illinois and Wisconsin ; Television Employment Units with five or more full-time employees in North Carolina and South Carolina ⁷

AUGUST 2016

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
August 6, 2016	Begin charging Lowest Unit Rates to political candidates who are running in primary elections, caucuses, or primary runoff elections (if necessary) to be held on September 20, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any September 20 th primary election, caucus, or primary runoff election. A primary election is scheduled in Massachusetts on September 20, 2016. ¹
August 14, 2016	For songs streamed during the month ending June 30, 2016 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁵

SEPTEMBER 2016

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
September 2016 (day TBD) ¹⁰	Annual FCC Regulatory Fees must be paid.	FCC	Commercial Full-Power and Class A Television Stations, TV Translators, TV Boosters, and LPTV Stations; Commercial AM and FM Radio Stations, FM Translators, and FM Boosters
September 9, 2016	Begin charging Lowest Unit Rates to political candidates who are running in general elections to be held on November 8, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by a November 8 th general election General elections are scheduled in
			all states on November 8, 2016. ¹
	For songs streamed during the month ending July 31, 2016 —		
September 14, 2016	(1) Reports of Use containing information about songs streamed; and	SoundExchange	Webcasters ⁵
	(2) Monthly royalty fee		

SEPTEMBER 2016

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
September 22, 2016	Begin charging Lowest Unit Rates to political candidates who are running in general runoff elections (if necessary) to be held on November 6, 2016.	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for federal, state, and local races to be decided by any November 6 th general runoff election. A general runoff election (if necessary) is scheduled in the U.S. Virgin Islands on November 6, 2016.

OCTOBER 2016

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
October 1, 2016	Annual EEO Public File Reports must be placed in stations' public inspection files.	Stations' Public Inspection File	Commercial and Noncommercial Full-Power and Class A Television Stations and AM and FM Radio Stations in Alaska, Florida, Hawaii, Iowa, Missouri, Oregon, Washington, American Samoa, Guam, the Mariana Islands, Puerto Rico, Saipan, and the Virgin Islands that are part of an Employment Unit ⁶ with 5 or more full-time employees
	Broadcast Mid-Term Report (FCC Form 397). ⁴	FCC; Stations' Public Inspection Files	Radio Station Employment Units ⁶ with 11 or more full-time employees in Iowa and Missouri ; Television Employment Units with five or more full-time employees in Florida , Puerto Rico , and the Virgin Islands ⁷
October 3, 2016 ³	Biennial Ownership Reports (FCC Form 323-E) must be filed and placed in stations' public inspection files. ⁴	FCC; Stations' Public Inspection Files	Noncommercial Television Stations in Alaska, Florida, Hawaii, Oregon, Washington, American Samoa, Guam, the Mariana Islands, Puerto Rico, Saipan, and the Virgin Islands; Noncommercial AM and FM Radio Stations in Iowa and Missouri

OCTOBER 2016

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
	Records showing compliance with commercial limits on Children's Television Programming during Q3-2016 must be placed in stations' public inspection files.	Stations' Public Inspection Files	Commercial Full-Power and Class A Television Stations
October 10, 2016	Issues/Programs Lists for Q3-2016 must be placed in stations' public inspection files.	Stations' Public Inspection Files	Commercial and Noncommercial Full Power and Class A Television Stations; Commercial and Noncommercial AM and FM Radio Stations
	Documentation of Class A Television Continuing Eligibility should be placed in stations' public inspection files. ²	Stations' Public Inspection Files	Class A Television Stations
October 11, 2016*	Children's Television Programming Reports (FCC Form 398) for Q3-2016 must be filed and placed in stations' public inspection files. ⁴	FCC; Stations' Public Inspection Files	Commercial Full-Power and Class A Television Stations
October 15, 2016	For songs streamed during the month ending Aug. 31, 2016 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁵

^{*} Columbus Day is October 10 so these obligations extend to the next business day.

NOVEMBER 2016

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
November 14, 2016	For songs streamed during the month ending Sept. 30, 2016 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁵

DECEMBER 2016

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
December 1, 2016	Broadcast Mid-Term Report (FCC Form 397). ⁴	FCC; Stations' Public Inspection Files	Radio Station Employment Units ⁶ with 11 or more full-time employees in Colorado, Minnesota, Montana, North Dakota, and South Dakota; Television Employment Units with five or more full-time employees in Alabama and Georgia ⁷
	Annual EEO Public File Reports must be placed in stations' public inspection files.	Stations' Public Inspection File	Commercial and Noncommercial Full-Power and Class A Television Stations and AM and FM Radio Stations in Alabama, Colorado, Connecticut, Georgia, Maine, Massachusetts, Minnesota, Montana, New Hampshire, North Dakota, Rhode Island, South Dakota, and Vermont that are part of an Employment Unit ⁶ with 5 or more full-time employees

DECEMBER 2016

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
December 1, 2016	Biennial Ownership Reports (FCC Form 323-E) must be filed and placed in stations' public inspection files. ⁴	FCC; Stations' Public Inspection Files	Noncommercial Television Stations in Alabama, Connecticut, Georgia, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont; Noncommercial AM and FM Radio Stations in Colorado, Minnesota, Montana, North Dakota, and South Dakota
	Annual DTV Ancillary/Supplementary Services Report (former FCC Form 317, now known as FCC Form 2100, Schedule G) must be filed.	FCC	Commercial and Noncommercial Full-Power and Digital Class A Television Stations, Digital TV Translators, and Digital LPTV Stations ¹¹
December 15, 2016	For songs streamed during the month ending Oct. 31, 2016 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁵

ENDNOTES

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¹ These election dates were identified based on information we found on certain state websites as of November 25, 2015. It is important to remember that many primary and caucus dates are subject to change, and there may be other Lowest Unit Rate periods for state and local elections that are not identified on this calendar.

² The FCC's rules do not specifically require Class A Television Stations to place documentation in their public inspection files demonstrating continuing eligibility for Class A Status on a quarterly basis. However, preparation of the quarterly issues/programs lists provides stations a good opportunity to prepare documentation supporting Class A eligibility. Accordingly, Class A Television Stations are strongly encouraged to place this information in their public inspection files ten (10) days after the end of each calendar quarter.

³ Because the deadline falls on a weekend and these documents must be submitted to the FCC, the deadline is extended to the next business day.

⁴ Because these forms are filed with the FCC and TV stations' public inspection files are now maintained online, TV stations do not have to upload these forms to their online public inspection files. Instead, the FCC will upload a TV station's electronically filed form to its online public inspection file.

⁵ This includes radio stations that simulcast their programming on the Internet.

⁶ For EEO purposes, a "Station Employment Unit" is a station or group of commonly-controlled stations serving the same general geographic area with at least one common employee.

⁷ If a television station employment unit employs fewer than five full-time employees, only the first two pages of this report need be filed (through Section I and the Certification).

⁸ Claims for compensation from the 2015 funds may be filed beginning in July 2016, but must be filed no later than July 29, 2016.

⁹ A television station may be eligible to receive compensation from the 2015 cable and satellite royalty funds if: (1) it holds the copyright to programming it has produced; and (2) its signal was either carried as a distant signal on a cable system in 2015 or rebroadcast by a satellite television service provider directly to individual homes.

¹⁰ The precise date for payment of annual FCC regulatory fees is usually determined during the summer. However, the deadline typically is set for a date in early to mid-September, though the deadline may be as early as sometime in August to as late as the end of September.

¹¹ Filers must also pay a fee equal to 5% of any gross revenues received from any ancillary or supplementary services provided for a subscription fee or charge, or for ancillary or supplementary services for which the filer received compensation from a third party (other than a commercial advertiser) in exchange for transmission of material provided by the third party.